

## **American Association of Airport Executives Questions and Comments Through ARAC Ex-Com on the June 2001 FTIHWG Final Report**

### **Question 1**

Throughout this report it is recognized that there is a potential hazard to ground service and airport personnel associated with the use of nitrogen in Ground Based Inerting (GBI) and it is difficult to assess the actual risk; text pages 16, 20 and 45

{ 4.4}. Despite identifying the risk, there was no mention of any ARFF requirements that airports might need to consider. New ARFF requirements could mandate specialized equipment and additional manpower, a major cost to airports. In addition there may be building and fire code requirements that need to be addressed regarding the storage of nitrogen on airports or within a terminal facility (pg 74 {6.4}).

### **Response:**

Time and manpower did not allow for a study of all the collateral issues associated with the proposed GBI concept such as airport safety and airport fire department responsibilities. Since building and fire codes can vary between local jurisdictions, it would have been difficult to identify all the potential problems. There would have to be a thorough risk assessment carried out as it would pertain to confined spaces entry, ground NEA saturation, proximity of equipment to the terminals, etc. The Airport Facilities Task Team identified these potential hazards so they may be properly addressed in advance of any decision to implement the GBI concept.

### **Question 2**

There are concerns expressed about the environmental impact and health and safety implications regarding the release of "...volatile organic compounds into the atmosphere" (pg. 61 {5.4.5}) and using nitrogen-enriched air (NEA) in GBI. Exhibit E also indicates that further environmental study would be required to better address this impact on airports. Addressing this environmental impact could be costly to airports and could impact the overall cost-benefit analysis.

### **Response:**

Environmental Impact Considerations of GBI – The AFTT completely agrees with the statement noted. This was a major issue with the concept of nitrogen saturating the fuel. As related in the final report, there are existing environmental pressures being exerted on today's airports. As such, the impact of adding an incremental known pollution source will require further research and evaluation. Again lack of time, resources and lack of readily available environmental baseline data prohibited the team from performing a thorough evaluation of all the issues and costs related to this.

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### **Question 3**

During the presentation as well as in the report (pg 177{11.2}) the term “Airport cost...” was used when talking about ground support equipment and hydrant systems. A distinction must be made that indicates that these are actually **airline** costs at airports.

#### **Response:**

The term “airport cost” was used to differentiate between the facility costs and the direct aircraft related costs of GBI. Because facility improvement and use agreements will vary from airport to airport, it was beyond the scope of the task team to identify who will be responsible for each of the costs.

### **Question 4**

There is language that seems to propose a regulatory change to 14CFR Part 139 that will require the airport operator to be responsible for the safety associated with ground based inerting (pg 187{12.3} and pg 190{12.5.2}). Why is this being proposed? Currently all fueling or such aircraft related operations are the responsibility of the airline.

#### **Response:**

The FTIHWG tasking statement directed the Group to propose regulatory language where it believed it was appropriate to do so. Referring to Part 139.321 “Handling and Storing of Hazardous Substances and Materials, the AFTT believed that the requirements set forth in this paragraph were applicable to the storage distribution and handling of NEA. If GBI becomes a requirement, the availability or lack of the necessary facilities could possibly impact the certification of the airport.

### **Question 5**

The report indicates that there could be delays associated with ground-based inerting (pg 60{5.4.4}). Were the costs of delays and the subsequent congestion associated with GBI factored into the cost-benefit analysis?

#### **Response:**

The maintenance costs for the delays were included, but the systemic costs (increased number of terminals, airplanes, personnel, etc) were not.